Law Offices of

## Donald J. Yannella

A NY Professional Corporation **Email:** nynjcrimlawyer@gmail.com

Tel: (212) 226-2883 Fax: (646) 430-8379

135 Prospect Street Ridgewood, NJ 07450 299 Broadway, Suite 800 New York, NY 10007 (Preferred mailing address)

December 5, 2024

Hon. Ronnie Abrams United States District Judge 40 Foley Square New York, NY 10007

Application granted.

SO ORDERED.

December 5, 2024

Re: United States v. Deandre Jackson, 23 Mag. 5339

Ronnie Abrams, U.S.D.J.

Dear Judge Abrams:

I am defense counsel for Deandre Jackson, who is on Home Detention as a condition of pretrial release. He is scheduled to plead guilty at 10 AM on December 10, 2024.

Mr. Jackson respectfully seeks permission to attend his maternal grandfather's surprise, 75<sup>th</sup> birthday party on December 8, 2024. As reflected in the flyer I provided to Pretrial and the Government, the "formal attire celebration" starts at 8:30 PM and ends at 1 AM, and it is at Shekinah Banquet Hall, 188-21 Linden Boulevard, Queens, New York. He would be travelling to the celebration with his mother, and they would leave home at 7:30 PM and arrive home by 1 AM.

Pretrial Services Officer Francesca Piperato informs me: "Per home detention policy we object to social requests but do note his compliance thus far."

AUSA Benjamin Burkett informs me that he takes no position on this application.

Sincerely, /s/

Donald J. Yannella, Esq.

cc. Pretrial Services Officer Piperato